

Honorable James L. Robart

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA *ex rel.*  
RAJU A.T. DAHLSTROM,

STATE OF WASHINGTON, *ex rel. RAJU*  
*A.T. DAHLSTROM*

Plaintiffs,

v.

SAUK-SUIATTLE INDIAN TRIBE of  
Washington, RONDA KAY METCALF,  
CHRISTINE MARIE JODY MORLOCK,  
ROBERT LARRY MORLOCK, and  
COMMUNITY NATURAL MEDICINE,  
PLLC,

Defendants.

NO. 16-CV-0052-JLR

DECLARATION OF THOMAS B.  
NEDDERMAN REGARDING  
PLAINTIFF'S MOTION FOR  
RECONSIDERATION

I, THOMAS B. NEDDERMAN, state and declare as follows:

1. I am counsel of record for the individual defendants in the above-captioned matter. I am over the age of 18 years and am competent to testify. All matters stated herein are made from my personal knowledge.

2. Attached to this declaration as **Exhibit 1** is a true and correct copy of the discovery requests Mr. Pope sent to Defendants in June 2018. Mr. Pope did not seek supplementation or send additional requests on behalf of his clients.

DECLARATION OF THOMAS B. NEDDERMAN  
REGARDING PLAINTIFF'S MOTION FOR  
RECONSIDERATION - 1

NO. 16-CV-0052-JLR

FLOYD, PFLUEGER & RINGER P.S.  
200 WEST THOMAS STREET, SUITE 500  
SEATTLE, WA 98119  
TEL 206 441-4455  
FAX 206 441-8484

1 I certify (or declare) under penalty of perjury under the laws of the State of Washington  
2 and the United States of America that the foregoing is true and correct.

3 DATED in Seattle, Washington this 16th day of December, 2019.

4 FLOYD PFLUEGER & RINGER, P.S.

5 By: /s/Thomas B. Nedderman

6 Thomas B. Nedderman, WSBA No. 28944

7 [tnedderman@floyd-ringer.com](mailto:tnedderman@floyd-ringer.com)

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13 *Counsel for Defendants Robert Morlock, Christine*  
14 *Morlock, and Ronda Metcalf*

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DECLARATION OF THOMAS B. NEDDERMAN  
REGARDING PLAINTIFF'S MOTION FOR  
RECONSIDERATION - 2

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